

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SONTERRA CAPITAL MASTER FUND LTD., FRONTPOINT EUROPEAN FUND, L.P., FRONTPOINT FINANCIAL SERVICES FUND, L.P., FRONTPOINT HEALTHCARE FLAGSHIP ENHANCED FUND, L.P., FRONTPOINT HEALTHCARE FLAGSHIP FUND, L.P., FRONTPOINT HEALTHCARE HORIZONS FUND, L.P., FRONTPOINT FINANCIAL HORIZONS FUND, L.P., FRONTPOINT UTILITY AND ENERGY FUND L.P., HUNTER GLOBAL INVESTORS FUND I, L.P., HUNTER GLOBAL INVESTORS FUND II, L.P., HUNTER GLOBAL INVESTORS OFFSHORE FUND LTD., HUNTER GLOBAL INVESTORS OFFSHORE FUND II LTD., HUNTER GLOBAL INVESTORS SRI FUND LTD., HG HOLDING LTD., HG HOLDING II LTD., and FRANK DIVITTO, on behalf of themselves and all others similarly situated,

Plaintiffs,

- against -

CREDIT SUISSE GROUP AG, CREDIT SUISSE AG, JPMORGAN CHASE & CO., THE ROYAL BANK OF SCOTLAND PLC, UBS AG, BLUECREST CAPITAL MANAGEMENT LLP, DEUTSCHE BANK AG, DB GROUP SERVICES UK LIMITED, and JOHN DOES NOS. 1-50,

Defendants.

No. 15-cv-00871 (SHS)

**DECLARATION OF CAROLINE IFRAH
IN SUPPORT OF DEUTSCHE BANK AG'S
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

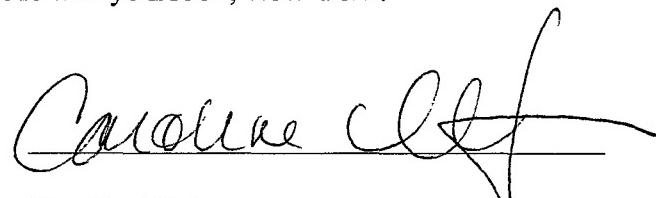
I, Caroline Ifrah, hereby declare:

1. I am a Director and Human Resources Business Partner of the New York branch of Deutsche Bank Aktiengesellschaft (“Deutsche Bank AG”). I submit this declaration in further support of Deutsche Bank AG’s motion to dismiss the above-captioned action for lack of personal jurisdiction. The facts stated herein are true based on my review of employment records maintained by Deutsche Bank AG.

2. In relation to the February 10, 2005 communication between an employee of BlueCrest Capital Management and an employee of Deutsche Bank described in Paragraph 40 of the Amended Complaint, the relevant Deutsche Bank employee was, on the date of the communication and at all relevant times, employed by Deutsche Bank AG’s London branch in the United Kingdom and was not employed by Deutsche Bank AG’s New York branch or any U.S.-based subsidiary of Deutsche Bank AG.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13th day of August 2015 in Rye Brook, New York.



Caroline Ifrah

